



**Siltronic, WS-33-81 DNAPL TCE Data and Data Trends**

**BAYUK Dana** to: McCue, Tom

03/24/2011 07:02 PM

Myron.Burr, "Gladstone, Alan", "James Peale", "Erik Bakkom", rjw,  
Cc: pdost, bhung, jedwards, cstivers, robe, Rene Fuentes, Chip  
Humphrey, Kristine Koch, Sean Sheldrake, PetersonLE,  
"ANDERSON Jim M", "GAINER Tom", "LARSEN Henning"

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1 attachment



Lcfnl-TCE\_Trends-WS33-81\_DNAPL.pdf

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Hello Tom.

DEQ reviewed the technical memorandum titled, "ISCR-Enhanced Bioremediation Performance Monitoring Data Submittal DNAPL and Groundwater Data – WS-33-81, Siltronic Corporation – ECSI #183" dated January 17, 2011 (WS-33-81 Memorandum), and an electronic copy of our comments letter is attached.

<<Lcfnl-TCE\_Trends-WS33-81\_DNAPL.pdf>>

A signed hard copy of the letter will be sent via regular mail this week.

The WS-33-81 Memorandum presents the results of analyzing DNAPL samples collected from monitoring well WS-33-81 from February 2009 through October 2010. The memorandum also compares the DNAPL results with analyses of groundwater samples collected from the same installation and presents Siltronic's interpretation of the data.

The primary purpose of DEQ's letter is inform Siltronic we do not accept the interpretations and/or conclusions presented in the WS-33-81 Memorandum regarding TCE concentration trends in DNAPL samples. In addition, DEQ considers it premature for Siltronic to draw conclusions regarding the effectiveness of EHC/KB-1 at reducing daughter product concentrations as evaluation of the data being collected is ongoing.

Please note this determination does not change DEQ's previous acknowledgement regarding TCE concentrations in groundwater (i.e., currently concentrations of TCE in groundwater collected from Group 1 and Group 2 performance monitoring wells are less than the RAO #1 criterion of 11,000 ug/L).

Siltronic should revise and resubmit the memorandum to provide information regarding the potential presence of TCE DNAPL in the subsurface. This was the original objective of collecting and analyzing DNAPL samples for analysis, and it is not mentioned or discussed in the WS-33-81 Memorandum.

Please contact me with questions regarding this e-mail or the attachment.

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